

EXHIBIT 83

Mechanical Steno - Computer-Aided Transcript

1 have an opportunity to review game film.

2 Q. What about for students, student athletes who live far
3 away, do you go to their games?

4 A. Depending on demographics. We're in Southern California.
5 So depending on demographics, we have coaches that we chat with
6 via phone. We talk, again, with their opponents' coaches,
7 their federations, their club coaches to get their perspective
8 thoughts on the player.

9 Q. What about for students who live overseas?

11:34 10 A. So overseas we have the ability to speak with our
11 federation coaches and we review game film.

12 Q. You mentioned that your number one criteria is talent.
13 Tell us a little bit more about what you're looking for in
14 deciding who to recruit.

15 A. Every year the players that we recruit, one, we look at
16 our roster, depending on specific personnel, position players.
17 You need to be talented to be able to compete and play for our
18 program at USC.

19 Q. Are there intangible factors that you look for besides
11:35 20 what you can see in the pool?

21 A. Absolutely. The reason why we go in person to recruit
22 players is, one, to see what their interaction is amongst their
23 teammates; two, what their interaction is amongst their coach.
24 Can they take direction? Do they take criticism? And lastly
25 we try to see what their interaction is outside of the pool.

1 Q. What are you looking for?

2 A. So we want selfless, hardworking kids, both men's and
3 women's, that strive for one goal, you know, an opportunity to
4 play when they potentially get to USC but ultimately to win a
5 championship.

6 Q. Do you have redshirts?

7 A. Yes, we do.

8 Q. What are redshirts?

9 A. So redshirts are incoming freshmen that don't have the
11:35 10 opportunity to play or contribute because of -- they just don't
11 cut it to be our top 16, our top 20.

12 Q. So what is their role and function on the team?

13 A. So their function is to be at practice daily, to be able
14 to push the players that contribute every day at practice.

15 Q. And then what?

16 A. And outside of -- outside of practice, when we travel,
17 redshirts help to do other team functions, as in help set up
18 the pool, as in help film games. You know, they're pretty much
19 a part of our team as much as our number one player is to
11:36 20 number 30 on the team. Everybody has a role.

21 Q. After a redshirt year, what are your expectations for
22 redshirts?

23 A. After that year, our expectation is, one, they get fit to
24 learn the system and ultimately contribute in the pool.

25 Q. When you say "contribute in the pool," are you talking

1 Q. The Southern Peninsula Club? You've never heard of Jack
2 Bowen's club?

3 A. Never heard of Sopen Club.

4 Q. You agree with me Jack Bowen is a respected water polo
5 coach?

6 A. Yes. In the high school community, absolutely.

7 Q. Do you know his accomplishments as a college player?

8 A. Yes. He's an Olympian. He was a goalie at Stanford.
9 He's a great water polo player.

02:30 10 Q. MVP 2 years in a row at the NCAA tournament?

11 A. That I'm not certain.

12 Q. His Stanford team won 2 years in a row at the NCAA
13 championship, correct?

14 A. I believe so. That was before my time at USC.

15 Q. But he's somebody you would view as a highly regarded,
16 highly successful high school water polo coach, correct?

17 A. Correct.

18 Q. And would a recommendation from a coach like Jack Bowen
19 that a candidate was good enough to play at USC, would that
02:31 20 carry weight?

21 A. Yes. Behind his name, yes.

22 Q. The Stanford Water Polo Club, do you know that?

23 A. Yes.

24 Q. Jack Barnaigh or John Barnaigh is the guy who runs it?

25 A. Correct.

1 wise in that redshirt year and they start their first of
2 4 years when they're a sophomore at USC, not a freshman,
3 correct?

4 A. Correct.

5 Q. They're bigger?

6 A. Yes.

7 Q. They've had a lot of the advantages of the level of
8 college coaching that can develop them better?

9 A. That's not an advantage. They're there every day
02:36 10 competing with their teammates so.

11 Q. You agree with me that the USC program's good at
12 developing the athletes?

13 A. We're the best.

14 Q. Being the best, you can take a high school kid and develop
15 them quite well over their redshirt year, correct?

16 A. That depends on the player, does that player buy into our
17 system, does that player understand what we're about, how's his
18 IQ, how's his physical talent. There's a lot of things that go
19 into it, but ultimately our goal is every redshirt that's there
02:37 20 freshman year that doesn't play, it's our job as coaches to
21 develop them to play to ultimately give them the opportunity to
22 play.

23 Q. In that time frame, Jovan was known for running some of
24 the most physically demanding water polo practices in the NCAA,
25 correct?

1 C E R T I F I C A T E

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3
4 UNITED STATES DISTRICT COURT)5 DISTRICT OF MASSACHUSETTS)
6
78 We, Kristin M. Kelley and Kelly Mortellite, certify
9 that the foregoing is a correct transcript from the record of
10 proceedings taken September 28, 2021 in the above-entitled
11 matter to the best of our skill and ability.
12
1314 /s/ Kristin M. KelleySeptember 28, 202115 /s/ Kelly MortelliteSeptember 28, 202116 Kristin M. Kelley, RPR, CRR
17 Debra Joyce, RMR, CRR
18 Official Court Reporter
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Date